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Remarks

Claims 1-16 were currently pending in this case.

The Examiner has rejected Claims 1-7 and 10-11 under 35 USC 112, stating that the "parallel method" and the claimed "method" are redundant. The term "parallel method" is defined in the present Specification on page 7 to include both "parallel procedures" and "parallel functions". Applicants have amended the language of the relevant claims to distinguish between the "computer-implemented method" which allows running at least one parallel method. Applicants believe that the amendments address any perceived redundancy.

The Examiner has rejected Claims 10 and 12-16 under 35 USC 101 as non-statutory subject matter. By this amendment, Claim 10 is canceled and Claims 12 and 16 have been amended to address the Examiner's concerns.

Claims 1-2, 6-11 and 16 have been rejected under 35 U.S.C. 102(b) as being anticipated by the Bundgen article. The Bundgen article is directed to a method for providing fine-grain parallelism. As stated in section 2.2 on page 272 (column 1, first full paragraph, lines 8-11), Bundgen either processes a list of data sequentially if it is short, or evenly divides the data into two equal parts and sends each for parallel computing, after which the results are merged. The Bundgen article does not teach or suggest the issuing of a dedicated parallelization call to a parallel program manager comprising all control information, said control information comprising the name, serialized arguments, and parallelization parameters for said parallel method, needed to allow for running the parallel method as a parallel program, as well as variables for receiving

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results. Bundgen does not teach or suggest a parallel program manager, and does not teach or suggest issuing a dedicated parallelization call to such a program manager. Rather, Bundgen simply evenly divides data (the SPLIT_LIST command of Fig. 2) and sends the split data for processing. Bundgen does not issue a call to a parallel program manager with all necessary information for the parallel program manager to handle the splitting of a parallel method, the running of the split method, and the handling of results.

Applicants further assert that Bundgen does not teach or suggest the claim feature wherein programming of the parallel program manager and the parallel program are independent of the programming of the sequential caller program in at least one of the following aspects: programming language, compilation, linkage, and hardware platforms. While the Examiner cites section 2.2 of Bundgen against that claim language, Applicants contend that there is no passage in Bundgen which teaches or suggests the independent programming.

Applicants aver that all of the pending claims recite the dedicated parallelization call to a parallel program manager with the recited control information (Claims 1-11) and/or that the programming of the respective programs being independent in at least one of programming language, compilation, linkage and hardware platform (Claims 1-16), which is neither taught nor suggested by the Bundgen article.

It is well established under U. S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Bundgen article does not teach steps or means for issuing a dedicated parallelization call from a sequential caller program to a parallel program manager with the

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recited control information, and does not teach or suggest independent programming in at least one of programming language, compilation, linkage and hardware platform, it cannot be maintained that the Bundgen article anticipates the invention as set forth in the independent claims, Claims 1, 9, 11-12 and 16, or the claims which depend therefrom and add further limitations thereto.

Claims 3-5 and 12-15 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Bundgen in view of Goldberg (USPN 6,571,232) (hereinafter Goldberg). The Examiner has failed to recite any suggestion in the art for combining the Bundgen and Goldberg references. Applicants rely on the analysis of the Bundgen article presented above and will not reiterate those arguments. With respect to the Goldberg patent, Applicants note that the Goldberg patent does not provide those teachings which are missing from the Bundgen article. The Goldberg patent is cited for its teachings regarding code generation. Goldberg shows how code can be generated based on templates for the issuing of data base queries, but does not teach or suggest generating code to issue a call to a parallel method. Since neither reference teaches the claim features, a *prima facie* case of obviousness simply has not been presented by the Examiner (*In re Wilson*, 424 F.2d 1382, 165 USPQ 494 (C.C.P.A. 1970)).

In view of the above amendments and remarks, reconsideration of the application and allowance of claims are respectfully requested. If there are any issues remaining which the Examiner believes to be resolved through either a Supplemental Response, Affidavit or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number indicated below.

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Authorization is hereby given to charge any fees necessary to enter this paper and any previous paper to deposit account 50-0510.

Respectfully submitted,

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